



U.S. Department of Justice

*United States Attorney
District of New Jersey*

*George L. Brandley
Assistant United States Attorney*

*970 Broad Street, 7th Floor
Newark, New Jersey 07102
(973) 645-2700*

GLB/LTR
2018R01264

January 3, 2025

Honorable Brian R. Martinotti
United States District Judge
Frank Lautenberg Post Office
& U.S. Courthouse
2 Federal Square
Newark, NJ 07102

Re: *United States v. Matthew Ellis, et al*,
Crim. No. 19-693

Dear Judge Martinotti:

Pursuant to paragraph 6(c) of the Court's Second Amended Scheduling Order, entered on December 19, 2024 (Dkt. No. 254) and the Local Rules of the District of New Jersey, the Government submits the following objections to the Defendant's Exhibit List. The Government reserves the right to amend or modify any of the objections set forth below on the basis of any stipulation entered into by the parties; corrections, revisions or other modifications to the underlying exhibits; any order from the Court on outstanding motions; and any ruling from the Court affecting the admissibility of the exhibits.

The Government objects generally, under Fed. R. Evid. 901, to the introduction of exhibits that are not properly authenticated, including but not limited to those exhibits identified below. The Government is willing to meet and confer with the defense counsel regarding means to resolve authenticity objections in advance of trial. However, even in instances where a stipulation as to authenticity may be reached, the Government reserves all other objections to admissibility including, but not limited to, objections based on lack of foundation, hearsay, and relevance.

Exhibit	Objection
Exhibit 3	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 6	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)

Exhibit 8	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 14	Form of exhibit (appears to be two separate, unrelated documents; <i>i.e.</i> , an email communication and a contract)
Exhibit 16	Authentication (Fed. R. Evid. 901)
Exhibit 25	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402); Hearsay (Fed. R. Evid. 802)
Exhibit 27	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 28	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 29	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 30	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 33	Authentication (Fed. R. Evid. 901); Hearsay (Fed. R. Evid. 802); Relevance (Fed. R. Evid. 402)
Exhibit 34	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402); Improper character evidence (Fed. R. Evid. 602)
Exhibit 35	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402); Improper character evidence (Fed. R. Evid. 602)
Exhibit 36	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402); Improper character evidence (Fed. R. Evid. 602)
Exhibit 70	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 73	Authentication (Fed. R. Evid. 901); Relevance (Fed. R. Evid. 402)
Exhibit 95	Authentication (Fed. R. Evid. 901); Hearsay (Fed. R. Evid. 802)
Exhibit 100	Authentication (Fed. R. Evid. 901); Hearsay (Fed. R. Evid. 802)

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

s/George L. Brandley
By: George L. Brandley
Bernard J. Cooney
Assistant U.S. Attorneys

cc: Dennis Kainen, Esq., *Counsel to defendant Matthew S. Ellis*